

### Qwest

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#### **Cronan O'Connell**

Vice President-Federal Regulatory

### **EX PARTE**

## **Electronic Filing via ECFS**

February 25, 2005

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Room TW B-204 Washington, DC 20554

RE: In the Matters of Level 3 Petition for Forbearance From Assessment of Access Charges

on Voice Embedded IP Communications, WC Docket No. 03-266; IP-Enabled Services,

WC Docket No. 04-36

Dear Ms. Dortch:

On Thursday, February 24, 2005, Cronan O'Connell and Melissa Newman, representing Qwest Communications International Inc. ("Qwest"), met with John Stanley, legal advisor to Commissioner Kathleen Abernathy of the Federal Communications Commission ("Commission"). The purpose of the meeting was to discuss the Level 3 Communications Forbearance petition. The discussion was consistent with Qwest's position as filed on the record to date. The attached handouts were used in the discussion.

In accordance with Commission Rule 1.49(f), this *ex parte* letter is being filed electronically *via* the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced dockets pursuant to Commission Rule 1.1206(b)(2).

Sincerely, /s/ Cronan O'Connell

Attachment

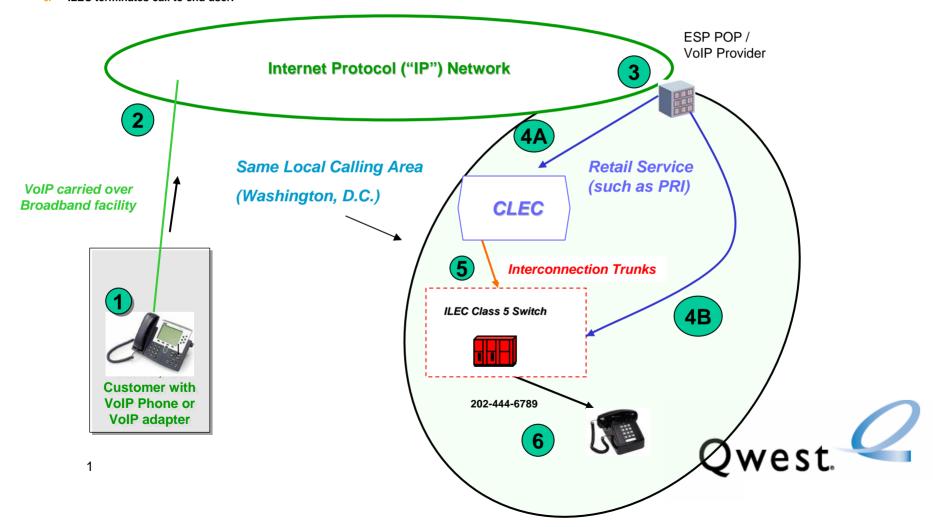
Copy to:

John Stanley (john.stanley@fcc.gov)

# **True-VolP-Originated Call to PSTN End User**

## ESP POP and Terminating End User in the Same LCA

- 1. VoIP Phone or VoIP Adapter at Customer Premises
- Call initiated in IP over a Broadband Connection (e.g. IP over: DSL, T1, or Cable modem)
- 3. Call is routed via the Internet Protocol Network to an Enhanced Service Provider/VoIP Provider's POP located in the same Local Calling Area as the terminating PSTN end user
- 4. ESP/ VoIP Provider purchases Retail Service (PRIs) to connect to CLEC (4A) or alternatively purchases PRIs to connect to the ILEC (4B).
- 5. CLEC passes traffic to ILEC via Interconnection Trunks. Reciprocal Compensation applies
- ILEC terminates call to end user.



## **PSTN-originated Call to VoIP End User in Different LCA**

- End user in Denver dials a "1+" call to an end user in Washington, D.C. Call is transported in TDM. The originating end user has purchased a telecom service from the originating LEC
- Call routes from ILEC SWC to designated IXC. Switched access / FG-D charges apply.
- IXC carries call from Denver to Washington, D.C. and hands the call off to Washington, D.C.-based ILEC. Jointly provided switched access charges
- The ILEC sends traffic via its tandem to the CLEC switch. Jointly provided switched access charges apply.
- CLEC sends the call to the ESP/VoIP Provider via a Retail Service (such as PRI) offered via contract or tariff.
- ESP/VoIP provider converts the call to IP and terminates the call to its VoIP end user customer via a broadband connection.

